

CaixaBank's
Human Rights
Policy

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Index

1

Introduction

pag. 3

2

Scope and field of application

pag. 3

3

Activity commitments and principles in

pag. 4

Our accountability with our employees

pag. 5

Our accountability as financial service providers

pag. 5

Our accountability with suppliers

pag. 7

Our accountability as part of the community

pag. 7

4

Implementation of the Policy

pag. 8

1

CaixaBank's Human Rights Policy

Introduction

The Board of Directors of CaixaBank, S.A. (hereinafter "CaixaBank" or the "Company") has enacted this Policy to manifest the Company's commitment with human rights, in accordance with the highest international standards.

For CaixaBank, the respect for human rights is an all-inclusive part of its values and the minimum standard for the legitimate development of its business activity.

CaixaBank also considers that the protection of human rights is primarily the responsibility of governments and that companies are accountable for promoting and respecting these rights within the scope of their activities.

Under this premise and in accordance with its *Code of Business Conduct and Ethics*, CaixaBank operates in a culture of respect for human rights and expects its employees, collaborators, partners and other parties directly associated with its operations, products and services to do likewise.

2

CaixaBank's Human Rights Policy

Scope and field of application

The principles of activity of this Policy will be the guide with regard to human rights of the relationships that CaixaBank establishes with its employees, clients, shareholders, suppliers, commercial partners and the communities where it performs its businesses and activities.

This Policy will be applicable to all employees, directors and members of the governance bodies of CaixaBank.

In addition, this Policy is applied at the Group level, whereby the Governance and Management Bodies of CaixaBank Group companies must make the pertinent decisions to implement its provisions in said companies, either by approving their own Policy in accordance with the principles established in this document or by adhering to those of CaixaBank, duly adapted where applicable.

CaixaBank will promote and make this Policy known among its stakeholders.

3

CaixaBank's Human Rights Policy

Activity commitments and principles

CaixaBank agrees to respect all human rights recognized internationally and set forth in:

- The United Nations International Charter of Human Rights, which consists of:
 - The Universal Declaration of Human Rights.
 - The International Covenant on Political and Civil Rights.
 - The International Pact of Economic, Social and Cultural Rights.
- The ILO Declaration on Fundamental Principles and Rights at work and the eight fundamental conventions identified by the same.

It also commits to carrying out its activity in strict fulfillment of the applicable standards and in accordance with the highest standards of ethics and professional conduct. These include the following:

- The Guiding Principles on Business and Human Rights of the United Nations.
- The OECD Guidelines for multinational enterprises.
- The United Nations Global Compact.
- The UN Womens' Empowerment Principles.
- The Equator Principles.
- The UN Principles for Socially Responsible Investment, adhered to by VidaCaixa and CaixaBank Asset Management.

CaixaBank endeavors to understand the impact on human rights derived from its activity and is committed to preventing and avoiding any contribution to the adverse detrimental impacts and to mitigate them insofar as possible, when applicable.

The Human Rights Policy is aligned with other specific standards and policies, such as the *Code of Business Conduct and Ethics*, the *Action Policy in Anti-corruption Matters* and the *Criminal Compliance Policy*, as well as with the adherence to international initiatives with regard to corporate accountability.

3.1 Our accountability with our employees

CaixaBank considers that the relationship with its employees is one of its main responsibilities with regard to human rights.

The policy of selection, management, promotion and development of human resources is based on the respect for the diversity, equal opportunities, meritocracy and non-discrimination due to gender, race, age, disability or any other circumstance.

Within this framework, CaixaBank has established internal policies and standards regarding:

- Promotion of diversity, inclusion and equal opportunities.
- Protection against harassment, discriminatory attitudes and abuse of authority.
- Freedom of expression and opinion.
- Freedom of association and collective bargaining.
- Work environment safety and occupational risk prevention.
- Prevention of corruption.
- A minimum compensation package that ensures the dignity of the person, in accordance with that established in applicable labor regulations.
- A work day that respects human rights and complies with applicable labor regulations.
- Enhancement of professional careers and training.
- Rejection of forced labor and child labor.

CaixaBank implements these policies and standards by conducting training and awareness programs and setting up follow-up indicators.

Compliance with CaixaBank codes of conduct are facilitated by confidential channels through which employees can manage any doubts that arise as regards their interpretation or practical application and report possible violations.

3.2 Our accountability as financial service providers

CaixaBank demands that its employees show respect for all individuals, their dignity and their key values, as set forth in its Code of Business Conduct and Ethics. It also aspires to work with clients that share its values as regards respect

for human rights, acknowledging that the degree in which it can exercise its influence will depend on the nature and circumstances of the relationship.

Following from this, CaixaBank is committed to placing all the means at the disposal of its clients to:

- Guarantee access to its services without discrimination due to gender, race, age or disability.
- Have a series of policies and procedures in place to ensure that the organization has a suitable knowledge on its clients, in accordance with the legal requirements applicable in each case.
- Respect the confidentiality, right to privacy and privacy of client and worker data.
- Develop new products and financial services consistent with its aspirations with regard to human rights.
- Offer clients products or services clients that are adapted to their circumstances and needs.
- Anticipate and offer solutions to those clients with financial difficulties to prevent them from entering into default.
- Have programs, products and services available for the most vulnerable groups and promote financial inclusion.
- Include social and environmental risks in decision-making and avoid financing or investing in companies and/or in projects related to serious human rights offenses. Specifically:
 - Financing of investment projects considered significant because of the amount or impact involved is carried out in compliance with the commitments undertaken as signatories to the Equator Principles and according to other internal standards on social and environmental risk management.
 - The criteria established in the Company's sectorial policies will be followed.
 - VidaCaixa and CaixaBank Asset Management have adhered to the United Nations Responsible Investment Principles as a demonstration of its willingness to integrate these principles in the management of investment funds and pension plans.

To this end, CaixaBank has policies, committees, processes of due diligence and other internal systems that assist in deciding when it is appropriate or permissible to engage in client relationships and to participate in certain operations. Controls are included in the general processes of the Company and vary according to the size, sector and profile of the client, as well as the geography, the context and the potential risk of the adverse impact. Similarly, if considered appropriate, external support is available to carry out these controls.

Additionally, CaixaBank has a Complaints and Claims Management Policy in effect to ensure fulfillment of this Human Rights Policy and all those that the Company is subject to. The purpose of the aforementioned policy is to ensure the application of the standards governing transparency and protection of financial service clients, with the ultimate goal of resolving conflicts and constantly improving the marketing processes of its services. The Company also provides several channels for communication, inquiries and claims that complement the official service channels.

3.3 Our accountability with suppliers

Caixabank demands that its suppliers show strict respect for human and labor rights and encourages them to include conduct aligned with its values in their practices and transmit them to their own value chain.

Thus, CaixaBank promotes and includes the following among its practices:

- *Supplier knowledge of and respect for the ethical, social and environmental standards for suppliers of the Group.*
- Knowledge of and respect for the Principles of the United Nations Global Compact.
- Performance of additional controls by suppliers considered internally as a potential medium-to-high risk.
- Implementation of the corrective actions required to mitigate non-compliance with its standards.

3.4 Our accountability as part of the community

The sustainability of CaixaBank's business model is directly linked to the prosperity of the territories in which it carries out its activity.

CaixaBank is committed to complying with all applicable laws, collaborating with public institutions and the legal system and respecting internationally recognized human rights, wherever it operates. CaixaBank is also committed to making a positive contribution to human rights in the communities where it operates. In accordance with the mission, vision, values and commitments established in its *Corporate Responsibility Policy* and *Environmental Policy*:

- It promotes the communication of international human right principles

within its field of influence by collaborating, insofar as possible, with other institutions, international organizations and government agencies.

- It promotes and promulgates initiatives and programs that represent a positive contribution to human rights and to the United Nations Sustainable Development Goals (decent housing, child vaccination, education, work integration of groups at risk of social exclusion, fight against climate change, eradication of poverty, etc.).

Additionally, CaixaBank provides several communication channels through which stakeholders can bring inquiries, suggestions and claims to its attention.

4

CaixaBank's Human Rights Policy

Implementation and communication of the Policy

Implementation of this Human Rights Policy by employees, managers and members of the governance bodies will include compliance with the Code of Business Conduct and Ethics adopted by the Board of Directors.

CaixaBank takes human rights actions into consideration when initiating, renewing, expanding or ceasing business relationships with third parties. In this regard, it agrees to dedicate the resources necessary to ensure effective implementation of this Policy.

The culture of human rights is integrated in the Company via periodic communications and training activities. Employees with functions that have a great potential impact on human rights (including the areas that manage *Project Finance*, work relations or security, among others) receive special training.

In addition, the Company periodically analyzes human rights affairs in association with its activity and introduces due diligence processes to assess the risk of non-compliance, followed by proposals of measures to prevent or remedy detrimental impacts and measures to maximize positive effects.

Moreover, it will maintain and provide information on effective mechanisms of communication or claims so the people directly affected by its operations can bring to its attention any situation that may have a possible impact with regard to human rights. CaixaBank endeavors constantly to align its communication channels with best practices at all times.

Specialized external counseling has been provided to prepare this Policy.

This Policy will be announced and communicated actively to all the staff, commercial partners and other relevant parties.

Policy approved by the Board of Directors on May 25, 2017 and revised on 20 September 2018

